

Name: **NELSON ROMERO**Address: **333 Arrowhead Blvd****Upland Ca. 91786**Phone: **909-286-6177**

Fax: \_\_\_\_\_

In Pro Per

SCANNED

2019 FEB 20 PM 1:54  
CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
RIVERSIDE

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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

**CBCHEMP. CORPORATION**  
**NELSON ROMERO**

Plaintiff

v.

**Saleh Sarwar**  
**Positive Roots**  
**Sal ?**

Defendant(s).

CASE NUMBER:

**EDCV19-00315** **PSG**

(KKx)

To be supplied by the Clerk of  
The United States District Court

## COMPLAINT

Comes Now, **NELSON ROMERO**, in Propria Persona, Pro Se, in the above captioned matter. The Defendant, Saleh Sarwar, landlord and owner of a retail shopping mall located at 218 East Highland San Bernardino, California 92404 is in violation of California Code 260000 et seq by leasing a commercial space adjacent to my business, a licensed and established CBD Hemp, a Corporation of Corporate Cannabis Company, to an illegal and unlicensed marijuana dispensary. The Plaintiff, **NELSON ROMERO**, seeking damages in the amount of \$800,000.00 due to the actions of the landlord by leasing a retail establishment to the illegal marijuana dispensary, Positive Roots, and violating California Code's, Business & Professions Code Sections 26000, et seq. Health & Safety Code Sections 11000, et seq.; 11357, et seq.; 11362.7, et seq.

The Plaintiff's actions have also violated CALIFORNIA CIVIL CODE SECTION 1954.25-1954.31 by leasing a commercial retail space to an illegal and unlicensed marijuana dispensary.

The defendants careless disregard for the laws and codes of the great state of California has created a dangerous and life-threatening safety concern to the other tenants of the commercial retail establishments. Within thirty (30) days of illegal operation, there have been a total of three burglaries that occurred at the illegal establishment and that has resulted in emotional stress to the plaintiff and employees of CBD Hemp, as well as an enormous loss in revenue.

Several attempts have been made by the Plaintiff to resolve the safety concerns that the landlord has created only to be answered with death threats made to the plaintiff as well as the plaintiffs' employees. Please see attached Exhibits as proof of the death threats.

In retaliation for requesting that the safety issues that the Plaintiff has created be remedied, the Defendant has threatened to evict the Plaintiff. Please see attached Exhibits as of proof of threats.

The Defendant has also violated a clause that was discussed prior to CBD Hemp signing a lease that states

In good faith an implied covenant that neither party shall do anything, which will have the effect of destroying or injuring the right of the other party, to receive the fruits of the contract in good faith and fair dealing.

A lawsuit has been commenced against you in the above-entitled Court by the Plaintiff. Plaintiff's claim is stated in the Complaint served with this summons. In Order to defend against his lawsuit, you must respond to the complaint by filing an answer by stating your defense in writing and serving a copy to the Plaintiff and or Plaintiff's Attorney within 20 days after service of this summons, excluding the day of service. If you are served outside the state, you will have 60 days after service of this summons. A default judgement may be entered against you without notice.

*John [Signature] 2-20-19*

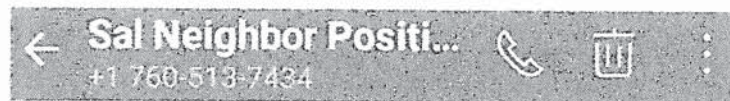
**IFP**  
**S**

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2



S I want you to know  
something if I  
wanted you out  
of that building  
I would go there  
remove you myself  
it would take me 20  
minutes to close  
you down that's  
not my interest at  
all my interest is  
for you to get your  
building secure  
so you don't have



All you have to  
do is ask do you  
understand me I  
don't want to see  
no more cops there  
bro or no more City  
officials

7:16 PM

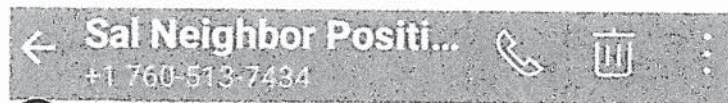
I dont either i dont  
want them to shut  
either of us down

7:17 PM



But two robberies  
in a week bro come  
on if you're going to





S But two robberies  
in a week bro come  
on if you're going to  
be in this business  
you have to be a  
professional you  
have to know what  
you're doing

7:17 PM

S If you want me to  
help you I will all  
you have to do is  
ask but please no  
bullshit going on  
there man leave

S

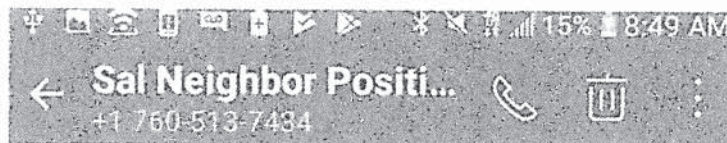
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See that now you're acting right bro if things were the other way around I would comply because I would not want to hurt your business at all my workers have family to feed car payments to make rent to pay on their houses they're good guys but they're not going to be pushed around bro

Dec 29, 2018 7:25 PM

Received

REPLY DELETE



S I catch him with a sign out there I'm going to crack his fucking head open, you can run to the cops I don't care if they're not going to help you

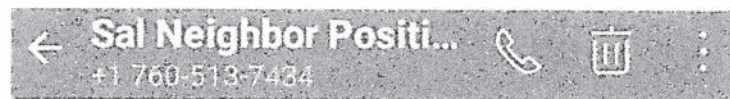
11:10 AM

11:11 AM

So your gonna hurt a innocent man whats wrong with are you ok

Im sorry but your disrespecting me to

7



S And what does that mean bro I don't really care about that what I care about is that my business is closed because of the way you have your business setup

5:20 PM

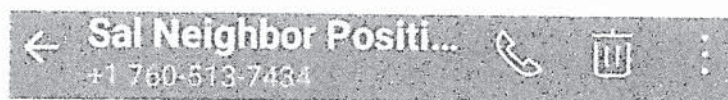
S So far you cost us over \$1,000

5:21 PM

S And look how much money you cost

8





S If you're going to  
be in this business  
you have to be a  
professional

5:24 PM

S What do you think  
happens next ? now  
the guy you shot  
gets his brother his  
gang members and  
they come after  
you ! more trouble

5:25 PM

Can i see you camera

9

7/17/2018 11:13 AM

11:11 AM So your gonna hurt a innocent man whats wrong with are you ok

11:13 AM Im sorry but your disrespecting me to much

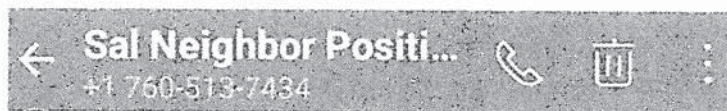
S I'll be there in a little bit

11:16 AM

S I need to talk to you and set the rules for a clinic and believe me bro

Enter message

10



S Not till Monday  
because we don't  
have the code to it I  
have to call the dealer

Listen do not  
connect my  
business with your  
business do you  
understand me!!!!  
Will

5:40 PM

5:41 PM Yes boss

Sal. You and i know

11c

+1 760-513-7434

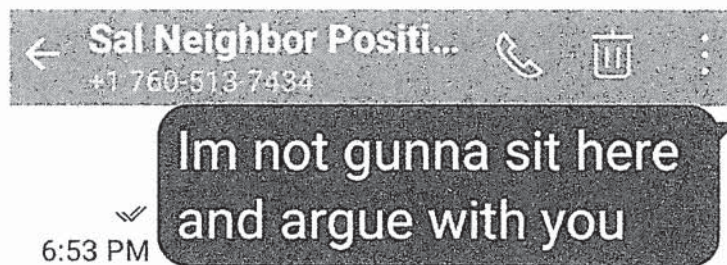
S I need to talk to  
you and set the  
rules for a clinic  
and believe me bro  
you going to follow  
them

11:17 AM

S I don't know why  
you're arguing with  
me you're going to  
lose all you need  
to do is secure  
your building and  
no more robberies  
that's all iust do it

Enter message





S When I see you I  
am going to deal  
with you harshly,  
how dare you make  
a comment like  
that

6:53 PM

S Go to my shop right  
now and look at the  
DVR see if they can  
get in with a code  
it's a pattern code

17-





S And I'm not talking about sales there's room for all of us but you got to do things right bro you can't be attracting the city so much

You don't ever give me an ultimatum dude ever I don't think you know who you're dealing with

Don't ever talk to

14.



S Don't put me to the  
test

6:55 PM

S Now you're acting like  
a chick

I'm going to deal  
with you when I see  
you

6:56 PM

Nah i dont want  
to talk to you no  
more your the worst  
person. In the world.

6:59 PM

S Keep on talking you're

15.

+1 760-513-7434

S You cannot  
advertise like that  
on your window do  
you understand me  
what's wrong with  
you man

1:34 PM

S Are you sure this is  
the route you want  
to go bro I told you  
a long time ago  
don't put me to the  
test man

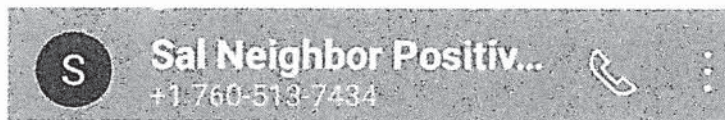
2:03 PM

S Bro whv don't you

Enter message

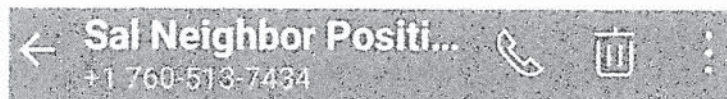


} 6.



And look how much money  
you cost the barbershop  
do you really think parents  
are going to let their kids  
go over there anymore? I  
wouldn't let my kids knew  
that Barbershop anymore all  
the shooting and cops and  
helicopters

17.



Don't ever talk to  
me like that again

6:48 PM

6:50 PM

I think your the one  
that sent him. your  
suspicious.

I know who you  
are and i always  
respected you  
but your taking  
advantage of me by  
the way u talking to  
me

18.



← Sal Neighbor Positi...  
+1 760-513-7434

5:19 PM

Yes

S Bro don't mention  
our name to the  
cops at all that's  
not cool

5:19 PM

No bro

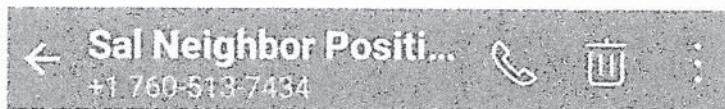
Relax

Im saying he came  
early and im sure  
your camera saw it

5:19 PM

S And what does that

(a.



S Keep on talking you're  
digging yourself  
deeper and deeper

You think I want to  
get involved in your  
mess don't involve  
me or my business  
or my employees in  
your mess dude

7:00 PM

S But I'm going to  
deal with you when  
I see you but I'll  
make you eat those

200